

IN THE SUPREME COURT OF FLORIDA

Case No.: SC2025-1325

MARIO MIRABAL,

Petitioner,

v.

KP INVESTMENTS MIAMI, LLC, and

DEUTSCHE BANK NATIONAL TRUST COMPANY,

Respondents.

PETITIONER'S MOTION TO AMEND PETITION TO INVOKE ALL
WRITS JURISDICTION

COMES NOW, Petitioner Mario Mirabal, pro se, and respectfully moves this Court for leave to file an Amended Petition to Invoke All Writs Jurisdiction under Article V, § 3(b)(8) of the Florida Constitution and Florida Rule of Appellate Procedure 9.100. As grounds therefor, Petitioner states as follows:

1. Procedural Background

On September 2, 2025, Petitioner filed a petition invoking this Court's All Writs jurisdiction under Article V, § 3(b)(8) of the Florida Constitution.

On September 4 and September 5, 2025, Petitioner filed two supplements

intended to inform the Court of material developments and post-petition judicial actions. By Order dated September 8, 2025, the Court construed those submissions as amendments and struck them, while expressly authorizing Petitioner to file a consolidated amended petition in full compliance with Rule 9.100.

2. Compliance with Rule 9.100

Petitioner now submits the accompanying Amended Petition for All Writs Relief, which:

Does not exceed 50 pages in length;

Contains all legal argument, jurisdictional basis, and factual background in one integrated filing;

Consolidates the original petition and both supplements;

Includes an updated Exhibit Index (A–L);

Incorporates all relevant post-petition developments, including federal litigation and pending sanctions activity.

This filing fully complies with Fla. R. App. P. 9.100(g) and the procedural instructions provided by the Court.

3. Request for Relief

WHEREFORE, Petitioner respectfully requests that this Court:

Grant this motion for leave to amend the original All Writs petition;

Accept the attached Amended Petition for All Writs Relief as the operative petition in Case No. SC2025-1325; and

Grant such other and further relief as this Court deems just and proper.

Respectfully submitted,

/s/ Mario Mirabal

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